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PUBLIC SERVICE  
COMMISSION

November 8, 2007

*via Hand Delivery*

Hon. Beth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

**Re: *In the Matter of: Notice of Intent of North Central Telephone Cooperative Corporation to File Rate Application, Case No. 2007-00162***

Dear Ms. O'Donnell:

On Friday, November 2, 2007 representatives for North Central Telephone Cooperative Corporation ("North Central") attended an informal conference in the above-referenced matter with staff from the Public Service Commission of the Commonwealth of Kentucky (the "Commission"). During the informal conference, Commission staff noted that North Central's rate application appeared to be based on a historical test period rather than a fully-forecasted test period as stated by North Central.

Upon further review, and by way of this letter, North Central advises the Commission that it wishes to convert its rate application from one based on a fully-forecasted test period, to one based on a historical test period of calendar year 2006. North Central believes that the rate application and supporting exhibits it filed on October 11, 2007 satisfy all of the filing requirements associated with a general rate case based on a historical test period. For the convenience of the Commission, the chart below identifies each filing requirement associated with a historical test period and indicates the corresponding paragraph or exhibit in the rate application filed on October 11, 2007 that satisfies the filing requirement.

<b>Historical Test Period Filing Requirements</b>	<b>Corresponding Rate Application Paragraph or Exhibit Satisfying the Requirements</b>
1. KRS 278.180--30 days' notice of rates to Commission	Exhibit 1

807 KAR 5:001:	
2. Section 8(1)--Full Name and Address of Applicant	Paragraph 1 of rate application
3. Section 8(2)--Original and ten copies of the application	The original and ten copies of the application were filed on October 11, 2007
4. Section 10(1)(b)(1)--Statement of the Reason the Adjustment is Required	Paragraph 3 of the rate application
5. Section 10(1)(b)(2)--Statement regarding Annual Reports	Paragraph 4 of the rate application
6. Section 10(1)(b)(3) and (5)--Statement regarding Articles of Incorporation	Paragraph 5 of the rate application
7. Section 10(1)(b)(6)--Statement regarding Assumed Name	Paragraph 7 of the rate application
8. Section 10(1)(b)(7)--Proposed Tariff	Exhibit 1
9. Section 10(1)(b)(8)--Proposed Tariff Changes	Paragraph 7 of the rate application and Exhibit 1
10. Section 10(1)(b)(9)--Statement re Public Notice	Paragraph 8 of rate application and Exhibit 2
11. Section 10(2)--Written Notice of Intent to File Rate Application	Paragraph 9 of rate application and Exhibits 3 and 4
12. Section 10(6)(a)--Description and Quantified Explanation for Proposed Adjustments	North Central is not seeking adjustments to the historical test period. The historical test period fully supports the rate increase sought by North Central as reflected in Exhibits 6, 7, 8 and 16.
13. Section 10(6)(b) and (c)--Supporting Testimony	Exhibits 6, 7 and 8
14. Section 10(6)(d)--Estimate of Effect of New Rates on Revenues	Exhibit 22

15. Section 10(6)(f)--Effect Upon Average Customer Bill	Exhibit 22
16. Section 10(6)(g)--Revenues from Present and Proposed Rates by Customer Class	Exhibit 22
17. Section 10(6)(h)--Summary of Revenue Requirements	Testimony of Gentry Underhill and Thomas Strait, Exhibits 7 and 8, respectively, and 2006 audited financial statement, Exhibit 16
18. Section 10(6)(i)--Reconciliation of Rate Base and Capital Used to Determine Revenue Requirements	Exhibits 7, 8, and 16
19. Section 10(6)(j)--Current Chart of Accounts	Exhibit 14
20. Section 10(6)(k)--Independent Auditor's Annual Opinion Report	Exhibit 16
21. Section 10(6)(l)--Most recent FCC Audit Report	Paragraph 20 of the rate application
22. Section 10(6)(m) -- PSC Form T	Paragraph 22 of the rate application and Exhibit 12
23. Section 10(6)(n)--Summary of latest Depreciation Study	Exhibit 17
24. Section 10(6)(o)-- List of Software Programs	Paragraph 31 of the rate application
25. Section 10(6)(p)--Prospectuses	Paragraph 21 of the rate application
26. Section 10(6)(q)-- Annual Report to Members for Previous Two Years	Exhibit 13
27. Section 10(6)(r)--Monthly Managerial Reports	Exhibit 15

28. Section 10(6)(s)--SEC Reports	Paragraph 27 of the rate application
29. Section 10(6)(t)-- Amounts Charged or Allocated by Affiliates	Paragraph 32 of the rate application
30. Section 10(6)(v)-- Cost of Service Studies	Paragraph 33 of the rate application
31. Section 10(7)(a-e) -- Pro Forma Adjustments	North Central is not requesting any pro forma adjustments to the historical test period
32. Section 10(3)(a)-- Rate Increase in Dollar Amounts and Reflected as a Percentage	Paragraph 44 of the rate application
33. Section 10(3)(b)--Present and Proposed Rates	Exhibit 1
34. Section 10(3)(d)-- Effect of Rate Increase Upon Average Bill	Paragraph 46 of the rate application and Exhibit 22
35. Section 10(4)--Copy of Public Notice	Paragraph 47 of the rate application and Exhibit 2

As indicated in the above chart, North Central's rate application filed with the Commission on October 11, 2007, fully satisfies all of the regulatory filing requirements associated with a general rate case using a historical test period. Thus, North Central believes that the Commission has sufficient information before it to fully evaluate North Central's application for an increase in basic residential and business rates.

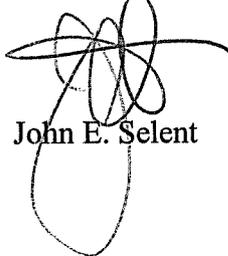
The proposed tariff filed with North Central's rate application is scheduled to take effect November 12, 2007. If the Commission needs additional time to review North Central's rate application prior to the effective date of the proposed tariff, North Central would be willing to delay the effective date.

Beth O'Donnell  
November 8, 2007  
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Thank you, and if you have any questions with regard to this matter, please call me.

Very truly yours,

DINSMORE & SHOHL LLP

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

John E. Selent

JES/HCW/rk

cc: Amy E. Dougherty, Esq.  
Tiffany Bowman, Esq.  
Dennis Howard, Esq.